January 25, 2007

Marlene H. Dortch, Esq. Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

MB Docket No. 87-268

KMGH-DT, Denver, Colorado

Facility ID No. 40875

Dear Ms. Dortch:

McGraw-Hill Broadcasting Company, Inc. ("McGraw-Hill"), permittee of KMGH-DT, Denver, Colorado (the "Station"), submits this Comment in response to the Seventh Further Notice of Proposed Rulemaking in the above-referenced proceeding.¹

Last month, Congress enacted a statute that effectively and finally allows for the construction of several Denver digital television stations – including the Station– that long has been delayed by local zoning issues. The statute also effectively eliminates antenna pattern constraints that had left the Station with less than optimal coverage and almost certainly would have resulted in service losses. Since passage of the statute, McGraw-Hill has been working to develop a more suitable antenna pattern to preserve free, over-the-air service for the Denver area. As of this time, however, McGraw-Hill has been unable to complete that analysis, especially in light of the potential for a combined antenna and consideration it must give to KTSC(TV), Pueblo, Colorado, a station with whom McGraw-Hill has an interference agreement regarding the respective TCDs. Accordingly, McGraw-Hill hereby respectfully requests leave to submit the particulars of the modified allotment at a time no later than the reply comment date.

Respectfully submitted,

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Darrell Brown General Manager

¹ Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MM Docket No. 87-268, *Seventh Further Notice of Proposed Rule Making*, FCC 06-150 (rel. Oct. 20, 2006) ("FNPRM").

² A Bill to Clarify Certain Land Use in Jefferson County, Colorado, Pub. L. No. 109-466 (2006).